

From: [Arati Furness](#)
To: [Richard North](#); [Matt Brown](#); gaudreaur@gtlaw.com
Cc: [Darren McDowell](#); [Eric Przybysz](#); [Jerald Davis](#); [Christina Natale](#); rlopez@lopezmchugh.com; [Matthew Lopez](#); [Maria Turner](#)
Subject: IVC Bard - proposed joint status report modifications
Date: Monday, January 20, 2020 1:47:25 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
Importance: High

Richard, since the last version of the exhibit list was circulated, we have corrected the issues specified below. Please accept this email as our second request for a meet and confer.

- These cases were previously identified on Exhibit G as having service issues. They have since been corrected and accordingly request that these cases be moved to Exhibit F.

Collins, Darleen Sue	CV-19-04088-PHX-DGC
Fatony, Richard Wayne	CV-19-04252-PHX-DGC
Perry, Russell Seward	CV-18-02831-PHX-DGC
Walker, Maurice	CV-18-02699-PHX-DGC

- Additionally, we have served PPF on the following cases previously listed on Exhibit H and request those also be moved to Exhibit F.

Babcock, Kristin	CV-18-00407-PHX-DGC
Black-Goodrow, Sherry Lynn	CV-18-00406-PHX-DGC
Colucci, Dominic S	CV-18-04924-PHX-DGC
Garza, Olga LQ	CV-19-02639-PHX-DGC
George, Vivian Esther	CV-18-02306-PHX-DGC
Gray, Eboni	CV-19-04041-PHX-DGC
Hartney, Christopher	CV-19-02322-PHX-DGC
Mayberry, William	CV-19-04089-PHX-DGC
Pruitt, Jessie	CV-19-03869-PHX-DGC
Santana, Alejandro G	CV-18-02264-PHX-DGC
Stafford, Scott	CV-19-04079-PHX-DGC
Walton, Edward	CV-19-02290-PHX-DGC
Ward, Tarvey	CV-19-03864-PHX-DGC

Arati C. Furness

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From: Arati Furness

Sent: Thursday, January 9, 2020 3:20 PM

To: 'Richard North' <richard.north@nelsonmullins.com>; 'Matt Brown'

<Matt.Brown@nelsonmullins.com>; 'gaudreaur@gtlaw.com' <gaudreaur@gtlaw.com>

Cc: Darren McDowell <dmcowell@fnlawfirm.com>; Eric Przybysz <ericp@fnlawfirm.com>; Jerald

Davis <jerald@fnlawfirm.com>; 'Christina Natale' <Christina@heardlawfirm.com>;

'rlopez@lopezmchugh.com' <rlopez@lopezmchugh.com>; 'Matthew Lopez'

<mlopez@lopezmchugh.com>; 'Maria Turner' <maria.turner@nelsonmullins.com>

Subject: RE: Bard IVC - Exhibit I

The following case was inadvertently left off our list of Exhibit "I" cases. This case is also to be included in our meet and confer.

LaToya D. Pierce v. C. R. Bard, Inc. and Bard Peripheral Vascular, Inc., United States District Court, District of Arizona, Phoenix Division, CV-17-01728-PHX-DGC

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From: Arati Furness

Sent: Thursday, January 9, 2020 1:51 PM

To: 'Richard North' <richard.north@nelsonmullins.com>; Matt Brown <Matt.Brown@nelsonmullins.com>; gaudreaur@gtlaw.com

Cc: Darren McDowell <dmcowell@fnlawfirm.com>; Eric Przybysz <ericp@fnlawfirm.com>; Jerald Davis <jerladd@fnlawfirm.com>; Christina Natale <Christina@heardlawfirm.com>; rlopez@lopezmchugh.com; Matthew Lopez <mlopez@lopezmchugh.com>; Maria Turner <maria.turner@nelsonmullins.com>

Subject: RE: Bard IVC - Exhibit I

Thanks, Richard. When are you available for a meet and confer regarding the cases on Exhibit I? We want to re-file these cases in state court for settlement purposes, and we believe it's in everyone's best interest for Bard not to oppose this course of action.

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From: Richard North <richard.north@nelsonmullins.com>

Sent: Thursday, January 9, 2020 1:12 PM

To: Arati Furness <afurness@fnlawfirm.com>; Matt Brown <Matt.Brown@nelsonmullins.com>; gaudreaur@gtlaw.com

Cc: Darren McDowell <dmcowell@fnlawfirm.com>; Eric Przybysz <ericp@fnlawfirm.com>; Jerald Davis <jerladd@fnlawfirm.com>; Christina Natale <Christina@heardlawfirm.com>; rlopez@lopezmchugh.com; Matthew Lopez <mlopez@lopezmchugh.com>; Maria Turner <maria.turner@nelsonmullins.com>

Subject: RE: Bard IVC - Exhibit I

Respectfully, I do not understand your email. The fact that cases are still in active negotiation is of no bearing at the moment. Judge Campbell has previously ordered that all cases not actually settled

as of now must be remanded/transferred. We cannot hold cases still being negotiated in abeyance any longer, and if there is no federal jurisdiction in any of those cases, we are obligated to point that out.

Richard

From: Arati Furness <afurness@fnlawfirm.com>

Sent: Thursday, January 9, 2020 1:53 PM

To: Richard North <richard.north@nelsonmullins.com>; Matt Brown <Matt.Brown@nelsonmullins.com>; gaudreaux@gtlaw.com

Cc: Darren McDowell <dmcdowell@fnlawfirm.com>; Eric Przybysz <ericp@fnlawfirm.com>; Jerald Davis <jeraldd@fnlawfirm.com>; Christina Natale <Christina@heardlawfirm.com>; rlopez@lopezmchugh.com; Matthew Lopez <mlopez@lopezmchugh.com>

Subject: Bard IVC - Exhibit I

Importance: High

◀**External Email**▶ - From: afurness@fnlawfirm.com

Hi Mr. North,

Can we set up a time to discuss our cases listed on Exhibit "I"? These cases should not be listed in Exhibit I we are still in active negotiations. If any objections are raised by the PSC, please consider these included. Also note there are a few cases listed below that were erroneously included in "D" that are not settled and should be listed instead on Exhibit "F".

EXHIBIT I

Richard St. John Barela, CV-17-02466-PHX-DGC
William Rivera, CV-19-03759-PHX-DGC
Jennifer Bounassi, CV-19-04084-PHX-DGC
Theresa Campbell, CV-19-02658-PHX-DGC
Maria M. Garcia and Angel Garcia, CV-18-01806-PHX-DGC
Richard M. Hand and Barbara Hand, CV-18-00401-PHX-DGC
Brian Hinchey, CV-19-02757-PHX-DGC
Teyrance Jackson, CV-19-03879-PHX-DGC
Arthur B. Kubofcik and Yevkine Kubofcik, CV-19-02331-PHX-DGC
Celeste C. Paige, CV-19-02672-PHX-DGC
Shakina C. Rainey, CV-18-02702-PHX-DGC
Michelle Raub, CV-19-03884-PHX-DGC
Beverly Stokes, CV-16-04294-PHX-DGC
Kenneth R. VanLuvender and Cynthia VanLuvender, CV-19-02355-PHX-DGC
Sharlene Williams, CV-18-03196-PHX-DGC

EXHIBIT D

Vickie Lynn Lambert, CV-19-02333-PHX-DGC
Bruce B. Coleman, CV-19-02759-PHX-DGC
Stanley J. Williams, CV-19-04254-PHX-DGC

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